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Investigation by the Department of Telecommunications and Energy)	
on its Own Motion, pursuant to G.L. c. 164 §§ 1A(a), 1B(d), 94;)	
and 220 C.M.R. § 11.04, into the Costs that Should Be)	DTE 03-88 F
Included in Default Service Rates.)	
)	

AG-WMECO-1-1 Please provide the following monthly bad debt data separately for the period from January, 2001 through December, 2003. Provide the data by rate class and by service type if available.

- Please supply the data in an Excel spreadsheet file as well as in a paper version.

- A. Monthly billed revenue by rate class (i.e. R1, R2, etc.) by energy supply (default, standard offer, competitive).
- B. Monthly kwh by rate class (i.e. R1, R2, etc.) by energy supply (default, standard offer, competitive).

AG-WMECO-1-3 Please provide the workpapers, backup, and calculations that support each

overhead factor used in your filing. Are these factors used in other regulatory cases? Please supply all recent (since 2002) WMECO testimony and workpapers with supporting backup including timesheets that use overhead factors. Explain their use in WMECO cost accounting and any other applications where they are used. Please supply the data in an Excel spreadsheet file as well as in a paper version.

AG-WMECO-1-4 Please fill in the matrix provided below for each month in 2003. Data should be consistent with the Department's Order in DTE 02-24/25. Provide the workpapers and backup that support each item, including supplier invoices. Please supply the data in an Excel spreadsheet file as shown below as well as in a paper version.

	Item	Source	Jan 03	Feb 03	Dec 03
1	Default Service Purchased Power Supplier Costs					
2	Number of Days Lag/365					
3	Working Capital Requirement	L1 X L2				
4	Cost of Equity	Cost of Equity				
5	Cost of Debt	Cost of Debt				
6	Effective Tax Rate					
7	Tax Adjusted Cost of Capital	$L5 * (L4 / (1-L6))$				
8	Cost of Working Capital	$L3 * L7$				

AG-WMECO-1-5 Please provide the data amounts, invoices and contracts associated with the consultant described in the Davis Testimony, Page 2, Lines 21-23 by month from January, 2002 through December, 2003. Do you expect to incur this expense in 2004? If so, please provide actual costs as available and estimates for all months in 2004.

AG-WMECO-1-6 Please identify where the RPS expenses discussed in the Davis Testimony, Page 2, Lines 8-9 are included in the default costs listed in Exhibit EAD-1 and detailed Workpapers 1 and 2. Please quantify the amount of RPS, and provide all backup and calculations to support the data.

AG-WMECO-1-7 Does WMECO incur costs for the Generation Information System (GIS)? If so, where do they appear in the workpapers. Please quantify the GIS costs, and provide all backup and calculations to support the data. If not, why not?

AG-WMECO-1-8 Please explain in detail what functions the Procurement/Contract Negotiation personnel perform. Provide a breakdown of the 1364 hours into these functions. Provide detailed backup for the labor rate, separating it into the 3 positions described in the Davis Testimony, Workpaper 2, and showing the basic rate and the overhead factor separately. Include copies of all timesheet records supporting this data.

- AG-WMECO-1-9** Please explain in detail what functions the Regulatory Attorney provides in the Other Costs section of the Davis Testimony, Workpaper 2. Please provide supporting timesheets, reports, and any other documentation available. Does this relate directly to the DTE consultant?
- AG-WMECO-1-10** Please explain what the TRACS Filing is in the regulatory section of the Davis Testimony, Workpaper 2.
- AG-WMECO-1-11** Please provide amounts, backup calculations, invoices and workpapers for all Alternative Compliance payments made to date. Identify Standard Offer and Default Service separately.